

COMMONWEALTH OF MASSACHUSETTS

SUFFOLK, SS.

SUPERIOR COURT  
No. 40906

CHURCH OF SCIENTOLOGY OF BOSTON, INC.,  
ON ITS OWN BEHALF AND ON BEHALF OF ITS  
MEMBERS; ROBERT JOHNSON; AND JANE DOE,

PLAINTIFFS,

v.

MICHAEL J. FLYNN, LUCY GARRITANO, STEVEN

GARRITANO, JAMES GERVAIS, AND PETER GRAVES,

DEFENDANTS.

COMPLAINT

INTRODUCTION

1. This suit arises out of the unlawful taking of membership lists, financial records, and other property owned by the plaintiff, Church of Scientology of Boston, Inc., a non-profit religious organization incorporated under the laws of Massachusetts. The documents and other property at issue were taken from the plaintiff Church without authority, by several of the defendants acting in concert. None of the materials have been returned to their lawful owner, the plaintiff Church.